

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Jeffrey Lynn Goss  
Debtors

CHAPTER 13

JPMorgan Chase Bank, National Association,  
Movant,  
v.

BANKRUPTCY CASE NUMBER  
23-00256

Jeffrey Lynn Goss,  
Respondent/Debtors,  
and  
Jack N. Zaharopoulos, Trustee,  
Additional Respondent.

**OBJECTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

JPMorgan Chase Bank, National Association, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about February 6, 2023, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 373 Tow Hill Road, Port Matilda, PA 16870.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$47,092.99.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$0.00 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, JPMorgan Chase Bank, National Association respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: 3.2.2023

BY: /s/Lorraine Gazzara Doyle  
CHRISTOPHER A. DENARDO 78447  
LORRAINE GAZZARA DOYLE 34576  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610) 278-6800/ fax (847) 954-4809

LLG File #:18-059106

pabk@logs.com

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Jack N. Zaharopoulos, Trustee  
Additional Respondent.

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of the Objection of JPMorgan Chase Bank, National Association to the confirmation of Debtor's Chapter 13 Plan of Reorganization, it is hereby ORDERED that the Objection is sustained, and confirmation of Debtor's Plan is denied.

BY THE COURT:

\_\_\_\_\_  
MARK J CONWAY  
UNITED STATES BANKRUPTCY JUDGE

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**CERTIFICATE OF SERVICE**

I, Lorraine Gazzara Doyle, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of JPMorgan Chase Bank, National Association's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on March 2, 2023:

Dorothy L. Mott, Esquire  
125 State Street  
Harrisburg, PA 17101  
Sent via electronic notification DorieMott@aol.com

Jack N. Zaharopoulos, Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Sent via electronic notification dehartstaff@pamd13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

/s/ Lorraine Gazzara Doyle

CHRISTOPHER A. DENARDO 78447  
LORRAINE GAZZARA DOYLE 34576  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
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